

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

JEFFREY CROSS, and  
PAMELA CROSS

Plaintiffs,

V.

EQUITYEXPERTS.ORG, LLC,  
d/b/a EQUITY EXPERTS

Defendant.

CIVIL ACTION FILE  
NO. 1:17-cv-03804-AT-JCF

**MOTION FOR PERMISSION TO WITHDRAW AS COUNSEL FOR  
DEFENDANT EQUITYEXPERTS.ORG, LLC d/b/a EQUITY EXPERTS**

**COME NOW** Womble Bond Dickinson (US), LLP, Arthur A. Ebbs, and Brittany Crosby (collectively “WBD”), pursuant to Local Rule 83.1(E) and the Georgia Rules of Professional Conduct, and respectfully request that the Court enter an order granting WBD permission to withdraw as counsel for Defendant EquityExperts.Org, LLC d/b/a Equity Experts (“Equity Experts”). In support of this Motion, WBD shows this Court the following:

Pursuant to Local Rule 83.1(E), on April 23, 2019, WBD gave Equity Experts fourteen (14) prior notice of WBD's intention to request permission to withdraw. WBD provided notice to Equity Experts in a letter delivered to Equity Experts' general counsel by electronic mail and Federal Express at Equity Experts'

office located in Michigan. The notice that WBD provided to Equity Experts contained all of the information required by Local Rule 83.1(E)(2)(b). A copy of the notice in redacted form is attached hereto as Exhibit “A”.

Local Rule 83.1(E)(1) provides that “counsel will not ordinarily be allowed to withdraw after pretrial or at a time when withdrawal will cause a delay in the trial of the case.” This is not the situation in this case. WBD’s withdrawal will not cause a delay in the trial of this case. There is no trial or other proceedings currently scheduled in this case. As such, WBD’s withdrawal will be consistent with Local Rule 83.1(E)(1).

For the foregoing reasons, WBD respectfully requests that the Court enter an Order permitting WBD to withdraw as counsel in this action. A proposed order has been filed contemporaneously herewith.

Respectfully submitted this 8<sup>th</sup> day of May, 2019.

WOMBLE BOND DICKINSON (US) LLP

/s/ Arthur A. Ebbs

Arthur A. Ebbs

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Brittany Crosby

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the within and foregoing MOTION FOR PERMISSION TO WITHDRAW AS COUNSEL FOR DEFENDANT EQUITYEXPERTS.ORG, LLC D/B/A EQUITY EXPERTS was electronically filed with the Clerk of Court using the CM/ECF system, which will automatically send email notification of such filing to the following attorneys of record:

James M. Feagle  
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and was also served on the following by Federal Express:

Jacqueline Galofaro  
Vice President and General Counsel, Equity Experts  
6632 Telegraph Road, #399  
Bloomfield Hills, Michigan 48301

This 8<sup>th</sup> day of May, 2019.

/s/ Arthur A. Ebbs  
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Arthur A. Ebbs  
State Bar No. 416181